

IMPROVEMENTS TO FAR 121.471(c)

Current interpretation of FAR 121.471(c) regarding crewmember rest requirements is unrealistic and jeopardizes passenger and crew safety. The current interpretations allow airline crew schedulers to create schedules that do not realistically protect crewmembers from excessive fatigue, therefore compromising safety. Reduced rest is based on SCHEDULED flight time only. It does not account for ACTUAL flight time or very long duty periods preceding or following reduced rest. There are currently numerous schedules that allow crews to work in excess of 12 hours prior to, or immediately following, an 8-9 hour reduced rest period. This does not mean 8-9 hours of sleep. In addition to sleep, the "rest period" currently includes the following:

- Transportation to and from the airport (usually 30 minutes round-trip)
- Waiting for ground transportation
- Addressing maintenance issues
- Eating a meal
- Ironing a uniform
- Showering/etc.
- Clearing and/or pre-clearing customs/immigrations
- Clearing airport security

This allows for an average of 6 hours of actual sleep, providing crewmembers fall asleep right away. If accounting for time to "wind down" before falling asleep, then average sleep on a reduced rest overnight is only 4-5 hours. Therefore, on many occasions, crewmembers are performing on 4-6 hours of sleep after a 12-hour duty day or going into a 12-hour duty day, or both. That is not enough sleep to recover from or prepare for a very long duty day. The only provision in FAR 121.471(c) to protect crewmembers from fatigue is the compensatory rest that is required to start no later than 24 hours from the start of reduced rest. That still leaves 15-16 hours available for duty after reduced rest, which many airline schedules take advantage of. There needs to be limitations on duty times proceeding and following reduced rest to protect crews from excessive fatigue.

FAR 121.471(c) needs to be re-evaluated, rewritten, and simplified to create a safer environment. FAR 121.471(c) should provide a minimum of 10 hours "rest" on a scheduled overnight to allow for an adequate amount of sleep. The reduced rest provision should apply only when delays are incurred and there is an important need to get back on schedule. Many airlines are using reduced rest in every-day schedules, exposing crewmembers to constant fatigue. This is a misuse of the intention of the regulation. While these types of schedules are economical and efficient for the airlines, they are not safe for the crewmembers or flying public.